

SHEARMAN & STERLING LLP

599 Lexington Avenue
New York, NY 10022-6069
+1.212.848.4000

jfortinsky@shearman.com
212.848.4900

December 29, 2020

Via ECF

Hon. Ona T. Wang
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Speakes v. Taro Pharmaceutical Industries, Ltd. et al., Case No. 16-cv-08318-ALC-OTW

Dear Judge Wang:

In the above-referenced action, we respectively represent Lead Plaintiff City of Atlanta Firefighters' Pension Fund and defendants Taro Pharmaceutical Industries Ltd., Michael Kalb, and Kalyanasundaram Subramanian. We are submitting this joint status letter pursuant to the order entered on September 10, 2020 (ECF No. 79).

Pursuant to a stipulation so-ordered by Your Honor on April 17, 2019 (ECF No. 76) (the "Stipulation"), fact discovery in this action is presently coordinated as described in the Stipulation with discovery in the multidistrict litigation in the Eastern District of Pennsylvania captioned *In re Generic Pharmaceuticals Pricing Antitrust Litigation*, No. 2:16-md-2724 (the "MDL"), and otherwise stayed. Fact discovery remains ongoing in the MDL. In accordance with the Stipulation, defendants have produced more than 85,000 documents in this action to date and are continuing to make productions pursuant to the Stipulation.

The parties are available to address any questions the Court may have.

SHEARMAN.COM

Shearman & Sterling LLP is a limited liability partnership organized in the United States under the laws of the state of Delaware, which laws limit the personal liability of partners.

Respectfully submitted,

BERNSTEIN LIEBHARD LLP

SHEARMAN & STERLING LLP

By: /s/ Michael S. Begin

By: /s/ Jerome S. Fortinsky

Michael S. Begin
10 East 40th Street
New York, New York 10016
Telephone: (212) 779-1414
begin@bernlieb.com

Jerome S. Fortinsky
599 Lexington Avenue
New York, New York 10022-6069
Telephone: (212) 848-4000
jfortinsky@shearman.com

*Lead Counsel for Lead Plaintiff Atlanta
Firefighters' Pension Fund and the
Proposed Class*

*Counsel for Defendants Taro Pharmaceutical
Industries Ltd., Michael Kalb, and
Kalyanasundaram Subramanian*

cc: Counsel of record (via ECF)